



October 22, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Communication: WT Docket Nos. 13-238, 13-32; WC Docket Nos. 11-59, 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45

Dear Ms. Dortch,

On September 30, 2013, Jonathan Adelstein and the undersigned of PCIA – The Wireless Infrastructure Association (“PCIA”) meet with Commissioner Ajit Pai and Jeffrey Neumann (“parties”). PCIA provided the parties with the attached study prepared by Information Age Economics entitled “Wireless Broadband Infrastructure: A Catalyst for GDP and Job Growth 2013-2017.”¹ The report evaluates the economic and job-creation impacts generated by projected wireless infrastructure investments between \$34 billion to \$36 billion per year over the next five years. These investments will yield several other benefits:

- Up to \$1.2 trillion in cumulative economic development over the next five years, a 606 percent increase over the total amount the wireless industry will invest.
- A 2.2 percent increase in GDP by 2017.
- A direct impact of up to \$87 billion of economic growth per year over the next five years, for up to a 0.5 percent improvement to GDP per year.
- The creation of over 1.2 million jobs in the next five years, including over 122,000 jobs in the wireless infrastructure industry alone.

PCIA noted that this projected economic and employment growth will only be realized through the establishment of policies that foster infrastructure deployment and industry investment. First, PCIA supports the Commission’s efforts to implement such policies in its recently released notice of proposed rulemaking on the acceleration of broadband infrastructure deployment.² Clarity in both the wireless facility siting shot clock and section 6409 of the Middle Class Tax Relief and Job Creation

¹ DR. ALAN PEARCE ET AL., WIRELESS BROADBAND INFRASTRUCTURE: A CATALYST FOR GDP AND JOB GROWTH 2013-2017 (2013), available at http://www.pcia.com/images/IAE_Infrastructure_and_Economy.pdf.

² *In re* Acceleration of Broadband Deployment by improving Wireless Facility Siting Policies; Acceleration of Broadband Deployment: Expanding the reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of way and Wireless Facilities Siting; Amendment of Parts 1 and 17 of the Commission’s Rules Regarding Public Notice Procedures for Processing Antenna Structure Registration Applications for Certain Temporary Towers; 2012 Biennial Review of Telecommunications Regulations, *Notice of Proposed Rulemaking*, WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59, RM-11688, FCC 13-122 (rel. Sept. 26, 2013).

Act of 2012 will foster consistency necessary for investment and will reduce friction created when national broadband policies objectives intersect with local concerns and priorities. Additionally, PCIA supports the Commission's proactive approach to examining the regulatory encumbrances on distributed antenna system and small cell deployment.

Second, PCIA urged the FCC's continued diligence in reforming the Universal Service Fund to more efficiently support the deployment of broadband, including wireless broadband, to unserved and underserved areas.³ PCIA noted that in addition to consumers and businesses, the agriculture and transportation industries are adopting wireless services, including machine-to-machine connections, which require additional infrastructure across rural America.

Third, PCIA urged swift FCC action to resolve the "Twilight Tower" issue. Twilight Towers are towers built between 2001 and 2005 that did not complete the Section 106 historic preservation review process. At that time, it was not clear whether Section 106 applied and many commercial and public safety structures did not work through the Section 106 process. In 2005, when the 2004 Nationwide Programmatic Agreement became effective,⁴ it became clear that the Section 106 process applied. Because successful completion of the Section 106 process is a predicate to collocation, Twilight Towers remain frozen in time and cannot be used for efficient deployment of commercial or public safety wireless broadband facilities. PCIA urged the Commission to continue to work with the Advisory Council on Historic Preservation to utilize a program comment to establish a procedure for bringing these towers into compliance expeditiously so that they may be fully utilized to expand broadband capacity and coverage consistent with Commission goals.⁵

Pursuant to Section 1.1206 of the Commission's rules, this notice is being filed via ECFS, and a copy will be provided via email to the attendees. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Jonathan Campbell

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CC: Commissioner Ajit Pai; Jeffrey Neumann

³ See generally Comments of PCIA – The Wireless Infrastructure Association, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337; CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208 (filed Jan. 18, 2012).

⁴ Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (2004), *available at* 47 C.F.R. Part I, Appendix C (2004)

⁵ See 36 C.F.R. § 800.14(e)(1). The Program Comment process described in 36 C.F.R. § 800.14(e)(1) was created to deal with issues that involve numerous undertakings that are likely not to have major effects.